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REMARKS

Claims 1, 2 and 4-24 are all of the claims presently pending in the application. The claims have not been amended by the present response.

Claims 1, 2 and 4-24 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Domini et al. (U.S. Patent No. 6,085,206) (hereinafter "Domini") in view of Schabes et al. (U.S. Patent No. 6,424,983) (hereinafter "Schabes").

These rejections are respectfully traversed in the following discussion.

I.   THE CLAIMED INVENTION

The claimed invention of exemplary claim 1, provides a method of intelligent spellchecking that includes comparing slot-filling information of the first parse to slot-filling statistics for the original word (e.g., see Application at page 11, lines 4-9). The method of the present invention takes into consideration an entire sentence and a structure of the entire sentence to determine whether a word is misspelled or not, which allows for more accurate spellchecking (see Application at page 3, lines 13-16).

II.   THE PRIOR ART REFERENCES

The Examiner alleges that Schabes would have been combined with Domini to form the claimed invention of claims 1, 2 and 4-24. Applicants submit, however, that even if combined, the alleged combination would not teach or suggest each and every element of the claimed invention.

That is, neither Domini nor Schabes, nor any combination thereof, teaches or suggests "comparing slot-filling information of the first parse to slot-filling statistics for the original word", as recited in claim 1, and similarly recited in claim 11, 20, 23 and 24.

Nowhere does Domini teach or suggest a method of intelligent spellchecking that includes comparing slot-filling information of the first parse to slot-filling statistics for the original word. Indeed, the Examiner does not even allege that Domini teaches or suggests this feature. In fact, the Examiner concedes that Domini does not teach or suggest this feature.

Furthermore, Applicants submit that Schabes does not make up the deficiencies of Domini. Indeed, the Examiner alleges that Schabes discloses comparing slot-filling

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information of the first parse to slot-filling statistics for the original word. The Examiner attempts to rely on column 10, lines 35-65 of Schabes to support his allegations. The Examiner, however, is clearly incorrect.

That is, nowhere, in this passage (nor anywhere else for that matter) does Schabes teach or suggest a method of intelligent spellchecking that includes <u>comparing slot-filling information of the first parse to slot-filling statistics for the original word</u>. Indeed, Schabes merely teaches providing a list of possible replacement words for a confusable word in a sentence.

That is, Schabes merely teaches providing a list of alternative words for a misspelled word and then determining which of the replacement words on the list is the best replacement (see Schabes at column 2, lines 45-59). Nowhere, however, does Schabes teach or suggest comparing slot-filling information to slot-filling statistics of the original word. Indeed, the Examiner does not even allege that Schabes teaches or suggest this feature.

The Examiner concedes that "[e]ven though Schabes reference does not explicitly spell out the word "comparing", however, one of ordinary skill in the art would have assumed that in order to select one of the alternative words from the contextually ranked list for the misspelled word (slot-filling information), there must be a step of comparing the misspelled word (slot-filling information) with the contextually ranked list (slot-filling statistics)" (see Office Action dated February 17, 2006 at page 11). The Examiner, however, is clearly incorrect.

That is, nowhere does Schabes (as conceded by the Examiner) teach or suggest <u>comparing slot-filling information of the first parse to slot-filling statistics for the original word</u>. Furthermore, nowhere does the Examiner provide any support, in Schabes or anywhere else, for his allegation that such comparing would have been obvious.

Moreover, the Examiner continues to mischaracterize the terms "slot-filling information" and "slot-filling statistics". Indeed, the Examiner alleges that slot-filling information refers to the misspelled word. The Examiner is clearly incorrect.

That is, as clearly described in the Application, the slot-filling information refers, for example, to the object and/or subject of a word, not the word itself. For example, in the phrase "I eat something", the subject slot of the word "eat" is "I", and the object slot of the word "eat" is "something". Thus, the slot-filling information is not the misspelled word itself.

Therefore, even assuming, *arguendo*, that the Examiner's assumption above is correct,

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Schabes would still fail to teach or suggest the claimed invention. The Examiner's allegation
that it would have been obvious from the teachings of Schabes to compare the misspelled
word to the list of alternative words does not teach or suggest comparing slot-filling
information of the first parse to slot-filling statistics for the original word.

Moreover, neither Domini nor Schabes, nor any combination thereof, teaches or
suggests "*comparing slot-filling information of the first parse to slot-filling statistics for the
original word*", as recited in claim 22.

The Examiner attempts to rely on Schabes to teach this feature of the claimed
invention. The Examiner, however, is clearly incorrect.

Indeed, Schabes merely teaches a method dealing with compound words and lexical
phrases (see Schabes at column 18, line 21 through column 19, line 12). Compound words are
understood by those of ordinary skill in the art to mean "adjacent words". Also, lexical
phrases are typically adjacent words such as "take place" (this is also evidenced by Schabes'
examples at column 18, lines 25-50).

In contrast, the claimed invention uses a parse to determine the slot-filling relations,
which means that the claimed invention can handle long-distance relations, and apply
statistical information in these cases. For example, if a sentence recited "Which flour did you
say was growing in the garden?", the claimed invention would determine that the writer
actually intended to say "flower" as opposed to "flour". Here, the parse supplies a user with
the long-distance information that "flour" is the subject of grow, and the statistical database of
slot-filling data indicates a strong preference for "flower" being the subject of grow rather
than "flour". This feature is not taught or suggested by Schabes.

Therefore, Schabes fails to make-up for the deficiencies of Domini.

Therefore, Applicants respectfully submit that even if combined, the alleged
combination would not teach or suggest each and every element of the claimed invention.
Therefore, the Examiner is respectfully requested to withdraw this rejection.

III.   FORMAL MATTERS AND CONCLUSION

In view of the foregoing, Applicants submit that claims 1-2, and 4-24, all of the claims
presently pending in the application, are patentably distinct over the prior art of record and are
in condition for allowance. The Examiner is respectfully requested to pass the above

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application to issue at the earliest possible time.

Should the Examiner find the application to be other than in condition for allowance, the Examiner is requested to contact the undersigned at the local telephone number listed below to discuss any other changes deemed necessary in a telephonic or personal interview.

The Commissioner is hereby authorized to charge any deficiency in fees or to credit any overpayment in fees to Assignee's Deposit Account No. 50-0510.

Respectfully Submitted,

Date: April 17, 2006

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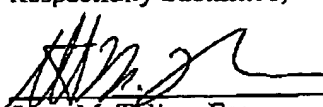Sean M. McGinn, Esq.
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I hereby certify that I am filing this paper via facsimile, to Group Art Unit 2176, at (571) 273-8300, on April 17, 2006.

Respectfully Submitted,

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